



However, the FCC has already found that wireless resellers, by definition, are subject to competition that will ensure that their rates are just and reasonable, and not unjustly or unreasonably discriminatory.<sup>1</sup> The FCC believes that competition among Lifeline providers “will spur innovation amongst carriers in their Lifeline offerings, expanding the choice of Lifeline products for eligible consumers.” *Id.* In addition, the FCC has rejected NASUCA’s arguments in similar proceedings, finding that the pricing issues are better left to the state commissions that will rule on the applicant’s petition for designation as an eligible telecommunications carrier.<sup>2</sup> The FCC stated that state commissions are in a better position to assess whether a particular Lifeline offering will benefit that state’s low income consumer.<sup>3</sup>

PTC did not propose any specific rate information in the petition because the service is not yet available.<sup>4</sup> It would therefore be premature for the company to announce rate plans until it can evaluate the market at that time. Notwithstanding, PTC fully expects that its Lifeline services will effectively compete with similar rate plans offered by Tracfone, Virgin Mobile or any other Lifeline provider operating in PTC’s service territory. These rate plans will likely include free or reduced cost handsets, and usage plans with very low monthly rates and free minutes. As the Commission is well aware, if PTC fails to offer competitive rates, it is doomed to fail in the highly competitive wireless marketplace. PTC’s presence alone, however, will, from a consumer perspective, positively affect the behavior of other service providers in the market, leading to lower prices and more choices for consumers.

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<sup>1</sup> See *In the Matter of Virgin Mobile USA, L.P. Petition from Forbearance, Order*, CC Docket 96-45 (released March 5, 2009) at para. 19.

<sup>2</sup> *Order, In the Matter of Carriers Eligible for Universal Service Support*, WC Docket 09-197 (released July 30, 2010) at 8-9.

<sup>3</sup> *Id.*

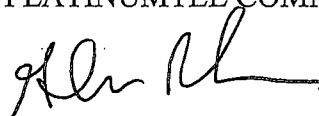
<sup>4</sup> PTC did state that customers will be able to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly packages of minutes in advance. Petition at 2.

## CONCLUSION

The NASUCA comments notwithstanding, PTC's request for forbearance satisfies the requirements of Section 10(a) of the Act and should be granted expeditiously so that PTC can begin to deploy its Lifeline services to the many low-income consumers that currently lack access to comparable and affordable telecommunications services.

Respectfully submitted,

PLATINUMTEL COMMUNICATIONS, LLC



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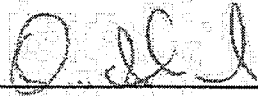
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August 18, 2010

Verification

I have read the foregoing Reply Comments of PlatinumTel Communications, LLC and the facts stated therein, other than those of which official notice may be taken, are true and correct to the best of my knowledge, information and belief.



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Title: CEO, Member

Date: August 18, 2010